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BY ECF

Hon. P. Kevin Castel
United State District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

August 31, 2022
Conference scheduled for September 7, 2022 is
vacated. Plea is scheduled for September 14, 2022
at 2:00 p.m. in Courtroom 11D.
SO ORDERED.
Dated: 9/1/2022



P. Kevin Castel
United States District Judge

Dear Judge Castel:

I am counsel to Mr. McKenzie in the above referenced case. As Your Honor is aware, a status conference in this case is currently scheduled for next Wednesday, September 7, 2022 at 4:00pm. I am writing to inform you that the parties have reached an agreement in principle on terms of a plea agreement. In order for me to meet face-to-face with Mr. McKenzie in preparation for his plea (Mr. McKenzie's work-travel schedule – he is a long-haul truck driver—and my pre-planned travel for the Labor Day Weekend make an in person meeting before September 7th challenging), we are requesting that the currently-scheduled pretrial conference be cancelled and that the court instead schedule a change of plea proceeding for any date and time the week of September 12th, except September 15th before 3pm (ideally September 14th as Wednesdays are best for Mr. McKenzie's work schedule).

In the event that there is an adjournment, we respectfully request and consent that time be excluded under the Speedy Trial Act until the next conference date set by the Court pursuant to Title 18, United States Code, Section 3161(h)(7)(A). The exclusion of time best serves the ends of justice and outweighs the best interests of the public and the defendant in a speedy trial as it will allow time for the parties to adequately prepare for a guilty plea. I have consulted with all three assigned AUSAs, who have reviewed this letter and consent to the adjournment request and to the exclusion of time on behalf of the government.

Thank you for your attention to this matter.

Sincerely,



Peter Katz, Esq.
Counsel to Greg McKenzie